



21st Floor
1251 Avenue of the Americas
New York, NY 10020-1104

Rachel F. Strom
212-403-4069 tel
212-489-8340 fax

rachelstrom@dwt.com

February 8, 2022

BY ECF

The Honorable Alison J. Nathan
United States District Judge
Southern District of New York
40 Foley Square, Room 2102
New York, New York 10007

Re: *Drummond Company, Inc., et al. v. VICE Media LLC*, Case No. 1:21-mc-00859

Dear Judge Nathan:

We represent Respondent VICE Media LLC (“VICE”) in the above-captioned matter. Petitioners Drummond Company, Inc. and Drummond Ltd. (“Drummond”) do not object to the request herein.

Today, VICE filed its opposition to Drummond’s motion to compel or, alternatively, to transfer. *See* ECF No. 11. We now write to seek leave to lodge with the Clerk of Court a thumb drive containing the audio of the podcast *The Crisis*, which is marked as Exhibit 1 to the Declaration of Kathleen Osborn. *See* ECF No. 12. As stated in Ms. Osborn’s declaration, the podcast is also available for free streaming on Spotify. Nonetheless, we would like to also provide the Clerk with a hard copy so that it can be included as part of the official court record. VICE is also serving a copy of Osborn Exhibit 1 on Petitioners and will provide a courtesy copy to chambers if the Court so desires.

Thank you for your attention to this matter.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read 'Rachel F. Strom', written over the printed name.

Rachel Strom

cc: All counsel of record (by ECF)